

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA,
:

- v. -
:

ISRAEL REYES, a/k/a "PC,"
ALFREDO SANCHEZ, a/k/a "Gordo,"
ALEXANDER MORILLO,
JUAN PIMENTEL, a/k/a "Lolo,"
and
JOSMARIL RODRIGUEZ,
:

Defendants.
:
-----X

COUNT ONE

INDICTMENT

14 CRIM 483

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| USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED JUL 17 2014 |
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The Grand Jury charges:

1. From at least in or about February 2014, up to and including at least in or about July 2014, in the Southern District of New York and elsewhere, ISRAEL REYES, a/k/a "PC," ALFREDO SANCHEZ, a/k/a "Gordo," ALEXANDER MORILLO, JUAN PIMENTEL, a/k/a "Lolo," and JOSMARIL RODRIGUEZ, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that ISRAEL REYES, a/k/a "PC," ALFREDO SANCHEZ, a/k/a "Gordo," ALEXANDER MORILLO, JUAN PIMENTEL, a/k/a "Lolo," and JOSMARIL RODRIGUEZ, the defendants, and others known and unknown, would

JUDGE PRESKA

and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that ISRAEL REYES, a/k/a "PC," ALFREDO SANCHEZ, a/k/a "Gordo," ALEXANDER MORILLO, JUAN PIMENTEL, a/k/a "Lolo," and JOSMARIL RODRIGUEZ, the defendants, conspired to distribute and possess with the intent to distribute was mixtures and substances containing one kilogram and more of heroin, in violation of 21 U.S.C. § 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offense alleged in Count One of this Indictment, ISRAEL REYES, a/k/a "PC," ALFREDO SANCHEZ, a/k/a "Gordo," ALEXANDER MORILLO, JUAN PIMENTEL, a/k/a "Lolo," and JOSMARIL RODRIGUEZ, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code § 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged in Count One of this Indictment, including but not limited to,

a. A sum in United States currency representing the amount of all proceeds obtained as a result of the offense alleged in Count One of this Indictment, and

b. A burgundy GMC Yukon with Vehicle Identification Number 1GKFK66U82J331637.

Substitute Asset Provision

5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;


d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

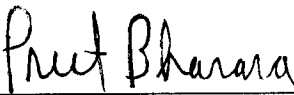
it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the said

defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)



FOREPERSON



PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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v.

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SANCHEZ, a/k/a "Gordo," ALEXANDER
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and JOSMARIL RODRIGUEZ,

Defendants.

INDICTMENT

(21 U.S.C. § 846.)

PREET BHARARA

United States Attorney.

A TRUE BILL

a. yfr

Foreperson.

7/17/14
ac

Filed Indictment
Case assigned to Judge Grisea
Judge Peek
USMA